

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
) No. 4:09-cv-11986-DPW
 v.)
)
 \$18,380,697.75 et. al.)
)
 Defendants.)

JOINT MOTION TO CONTINUE STATUS CONFERENCE
AND HEARING ON PENDING MOTIONS

The United States of America, by its undersigned counsel, and Claimants Multinvest Casa de Bolsa, C.A. ("Multinvest"), Spectre Capital, Inc. ("Spectre"), and Spencer International Traders ("Spencer"), by their undersigned counsel, hereby move that this Court continue the status conference and hearing on pending motions, now scheduled for Tuesday, November 30, 2010, to a date convenient to the Court in January 2011, for the reasons set forth below.

The government and Claimant Multinvest (claimant to the *in rem* defendant \$18,380,697.75 in U.S. Currency) have reached a tentative settlement in this case. The proposed settlement, which, if approved by this Court, would moot the pending motions and make the status conference unnecessary, cannot be submitted to the Court without high-level approval by the Department of Justice. The proposed settlement is now undergoing that DOJ approval process.

The government and Claimant Spectre (claimant to the *in rem*

defendant \$995,233.44 in U.S. Currency) are currently attempting to negotiate a settlement of this case, and expect to reach a settlement, or to determine that no settlement is possible, by the end of this calendar year.

The government and Claimant Spencer (claimant to the *in rem* defendant \$16,101.72 in U.S. Currency) have already settled their dispute in this case, and moved jointly on November 5, 2010, for a final order of forfeiture and order releasing other property to carry out their settlement.

WHEREFORE, for all of these reasons, the United States, Multinvest, Spectre, and Spencer hereby request that this Court continue the status conference and hearing on pending motions from November 30, 2010, to a date convenient to the Court in January 2011.

Respectfully submitted,
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Dated: November 12, 2010

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CERTIFICATE OF SERVICE

I hereby certify that I am filing the foregoing document via the ECF system, which will cause a copy to be sent to claimants' counsel by electronic mail.

Date: November 12, 2010

/s/Richard L. Hoffman
RICHARD L. HOFFMAN
Assistant U.S. Attorney